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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEMAJ AYERS

Defendant.

Case:2:22-cr-20597
Judge: Murphy, Stephen J.
MJ: Grey, Jonathan J.C.
Filed: 11-10-2022 At 03:24 PM
INDI USA V. AYERS (NA)

Violations:

18 U.S.C. § 1343

18 U.S.C. § 1028A

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1343 – Wire Fraud)

Beginning in or around May 2020 and continuing through in or around May 2021, in the Eastern District of Michigan and elsewhere, the defendant, SEMAJ AYERS, with the intent to defraud, knowingly devised and executed a scheme to defraud in order to deprive another of money and property by means of materially false and fraudulent representations.

The purpose of the scheme to defraud was for SEMAJ AYERS to unlawfully obtain state and federal unemployment insurance (UI) benefit money.

It was part of the scheme that SEMAJ AYERS submitted false and fraudulent UI benefit claim applications to multiple states—including Michigan and Arizona—in his own name and in the names of various individuals, without their consent, knowledge, or permission.

It was part of the scheme and artifice that false and fraudulent UI benefits claims in SEMAJ AYERS' name were submitted to multiple states, including Michigan and Arizona.

It was further part of the scheme that SEMAJ AYERS submitted false and fraudulent UI benefit claim applications in Maryland in the names of various individuals, without their consent, knowledge, or permission.

It was part of the scheme that SEMAJ AYERS used these other individuals' names, social security numbers, and other personal identifiable information (PII), without their consent, knowledge, or permission, in the course of the UI benefit claim submission process.

It was further part of the scheme and artifice that, for the UI benefit claims submitted to Maryland, SEMAJ AYERS would cause a bank to mail, via U.S. Postal Service, debit cards to an address in his control. These debit cards ("UI debit cards") were then loaded, electronically, with state and federal UI benefits by the various state treasury departments.

It was further a part of the scheme and artifice that once SEMAJ AYERS obtained these UI debit cards, he would use the funds contained thereon in the Eastern District of Michigan and elsewhere.

During the time period set forth above, in the Eastern District of Michigan, for the purpose of executing the above-described scheme to defraud, SEMAJ AYERS knowingly transmitted and caused the transmission by means of wire, radio, or television communication, writings, signals, pictures, and sounds in interstate commerce, in the form of: on June 30, 2020, an interstate electronic submission of a fraudulent UI claim was filed from within the Eastern District of Michigan to the Maryland Department of Unemployment Insurance (“DUI”), in violation of Title 18, United States Code, Section 1343.

COUNT TWO

(18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

The allegations contained in Count One are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

On or about June 30, 2020, in the Eastern District of Michigan and elsewhere, the defendant SEMAJ AYERS, knowingly possessed and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028(A)(c)—that is, Wire Fraud, in violation of 18 U.S.C. § 1343, as alleged in Count One—knowing that the

means of identification belonged to another actual person, in violation of Title 18,
United States Code, Section 1028A(a)(1).

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Craig Wininger
CRAIG WININGER
Chief, Violent and Organized Crime Unit

s/David Cowen
DAVID COWEN
Assistant U.S. Attorney

s/Jeanine Brunson
JEANINE BRUNSON
Assistant U.S. Attorney

Dated: November 10, 2022

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>DPC</i>

Case Title: USA v. Semaj Ayers

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-MJ-30472]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 10, 2022
Date

[Signature]
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.